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BEFORE THE ARIZONA CORPORATION COMMISSION

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2009 JUL -6 P 4: 06

JUL -6 2009

ALL CASES COMPLETED  
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IN THE MATTER OF ARIZONA PUBLIC  
SERVICE COMPANY AND VERIZON  
CALIFORNIA, INC.'S JOINT PETITION FOR THE  
ESTABLISHMENT OF AN UNDERGROUND  
CONVERSION SERVICE AREA.

DOCKET NO. E-01345A-07-0663

DOCKET NO. T-01846B-07-0663

STAFF'S RESPONSIVE BRIEF

As directed by the Procedural Order dated May 11, 2009, the Utilities Division of the Arizona Corporation Commission (Staff) files its response to the questions posed by Administrative Law Judge Sarah Harpring.

#### I. INTRODUCTION.

This case arises pursuant to A.R.S. § 40-341 et. seq., *Conversion of Overhead Electric and Communication Facilities*. The statute allows property owners to petition to the appropriate public service corporations to convert overhead electrical and communications facilities to underground facilities under certain conditions. If those conditions are met, the public service corporations are then obligated to petition the Arizona Corporation Commission ("ACC" or Commission") for an order establishing an underground conversion service area and directing the conversion of overhead facilities to underground.

The property owners within the Hillcrest Bay Mobile Manor ("Hillcrest"), near Parker, Arizona, submitted petitions to Arizona Public Service Company ("APS") in order to convert overhead facilities within their area to underground. In 2006, APS received a petition requesting that a joint cost study be prepared. APS determined that the initial statutory requirements had been met, i.e., sixty percent of the property owners owning over sixty percent of the real property on a square footage basis. APS then coordinated with Verizon California, Inc. ("Verizon") for the production of Verizon conversion cost estimates in order to develop a joint report to the Hillcrest property owners. APS, on behalf of itself and Verizon, mailed each property owner within the proposed underground

1 conversion service area ("UCSA"), a copy of the Joint Report of Estimated Utility Conversion Costs,  
2 which contained the cost estimates of both APS and Verizon to convert the overhead lines of the  
3 companies to underground facilities. In June 2007, APS received the second set of petitions from  
4 Hillcrest. The La Paz County Assessor certified that the copies of the petitions for the property  
5 owners were correct as stated with the address ("Establishment Petition"). APS and Verizon then  
6 filed the Joint Petition that is the subject of this action.

7 An evidentiary hearing was held on January 28, 2008. At the conclusion, Staff, APS and  
8 Verizon filed closing briefs. A Recommended Opinion and Order ("ROO") was issued and set for the  
9 July 1 and 2, 2008 Open Meeting. At the Open Meeting on July 1, there was lengthy discussion, and  
10 the Commission ultimately pulled the ROO from the agenda without decision to allow the parties  
11 time to file additional information in the docket regarding the issue of economic feasibility. The  
12 Commission directed the Hearing Division to issue a Procedural Order to keep the record open for 10  
13 months to allow parties to make the additional filings.

14 On May 1, 2009, APS filed an economic feasibility update for the UCSA. APS indicated that  
15 while it did not anticipate that the costs for the UCSA would decrease it would re-bid the UCSA  
16 project if the UCSA is approved. Hillcrest filed updated documentation in support of the UCSA.  
17 Hillcrest stated that it created a financial assistance program to assist low-income owners through  
18 assistance to be provided by the Tades, Inc., ("Tades") the trenching contractor. Hillcrest also  
19 provided 2 revised cost estimates, the first of which shows an overall reduction in private costs of  
20 \$51, 093 and the second of which shows an overall reduction in private costs of \$665,124 based upon  
21 an assumption that Tades will be permitted to do some of the work for which APS and Verizon  
22 previously provided public cost and service cost estimates. There is no indication that APS or  
23 Verizon has agreed to allow Tades to perform any of this work. Hillcrest also submitted a letter from  
24 Phil Garcia, a former appraiser, who opined that the undergrounding could increase property values  
25 for 80% of the properties in Hillcrest Bay. Hillcrest also included a tabulation of the results to a  
26 petition mailed July 2008, for which 193 responses were received, 127 in favor and 66 opposes. An  
27 updated property list showing ownership as provided by the La Paz County Recorder's office as of  
28 April 9, 2009 was submitted. Ownership of 5 parcels has changed and several parcels have been

1 combined. Hillcrest also stated that there are safety and health issues related to utility lines hanging  
2 over backyards and patios.

3 The establishment of an UCSA in the Hillcrest Bay has generated a significant amount of  
4 public comment. An UCSA can bring with it the specter of significant costs to a property owner. The  
5 legislature has provided a means for citizens to improve the aesthetics of the property and to spread  
6 the costs as fairly as possible within the UCSA, while allowing the consideration of whether the  
7 aesthetics outweigh the economic cost. Administrative Law Judge Harpring, in the procedural order  
8 dated May 11, 2009, outlined four issues to be discussed: (i) the appropriateness of considering  
9 updated cost estimates in determining whether the cost of conversion is economically feasible given  
10 the requirements of ARS § 40-346 (A) and ARS § 40-342; (ii) should the Commission consider  
11 withdrawals of signature and/or objections to the USCA received later than January 8, 2009; (iii)  
12 What is the current level of support among the property owners for the USCA? and (iv) If the current  
13 level of support is less than 60% for either number of parcels or square footage can and should the  
14 Commission approve the UCSA.

15 Staff would also note that Verizon has filed an application to transfer its assets in the Parker  
16 area.<sup>1</sup> Staff has not formed an opinion on the effect on a transfer upon the conversion process.

17 **II. IS IT APPROPRIATE TO CONSIDER UPDATED COST ESTIMATES IN**  
18 **DETERMINING WHETHER THE COST OF CONVERSION IS ECONOMICALLY**  
19 **FEASIBLE IN LIGHT OF THE REQUIREMENTS OF A.R.S. §40-346(A) AND**  
20 **A.R.S. §40-342?**

21 The conversion process begins with a petition signed by not less than 60 percent of the  
22 owners of contiguous real property within the area who own not less than 60 percent on a square foot  
23 basis of the real property within the area. The petition is directed to the appropriate public service  
24 corporation to initiate a study of the cost associated with the conversion of overhead to underground.<sup>2</sup>  
25 Within 120 days of receipt of such a petition, each public service corporation serving the area sought  
26 to be designated as an underground conversion service area is required to make a study of the cost of  
conversion of the facilities to underground.<sup>3</sup> Once that study is complete, a summary of the estimate

27 <sup>1</sup> Docket No. 09-0274

28 <sup>2</sup> A.R.S. § 40-342(A).

<sup>3</sup> A.R.S. § 40-342(D).

1 of the cost to be assessed against each lot or parcel of real property is to be made available to each  
2 owner of real property located within the proposed underground conversion service area.<sup>4</sup>

3       Once the cost study is made available to the property owners, they have 90 days in which to  
4 decide whether they want to continue with the process of conversion. If so, 60 percent of the owners  
5 of real property representing 60 percent of the real property's area within the proposed conversion  
6 service area must petition each public service corporation for the establishment of an underground  
7 conversion area. Upon receipt of this petition, the public service corporation has sixty days in which  
8 to petition the Commission for the establishment of an underground conversion service area.<sup>5</sup> After  
9 appropriate notice is provided as required by statute, the Commission is required to conduct a hearing  
10 regarding the establishment of the underground conversion service area.<sup>6</sup>

11       At this juncture, what has been provided thus far is incomplete. ARS §40-347 (B) states that  
12 the cost of conversion shall not exceed the cost estimates provided in the joint report prepared by  
13 APS and Verizon. So it appears that, even if the costs have risen in the 2 years since the petition was  
14 filed, APS and Verizon are limited to recover the estimated costs set forth in the joint report. While  
15 Hillcrest has provided updated cost information regarding the private costs, there is no indication that  
16 APS and Verizon have been consulted regarding allowing another contractor to perform some of the  
17 work that the utilities would perform.

18       In order for Staff to opine on whether the conversion is economically feasible, complete  
19 information is needed. Not knowing whether APS would consider using a different contractor, which  
20 may lower the cost estimates, limits Staff's ability to provide a recommendation. The Commission, in  
21 the exercise of its discretion, may consider the evidence of the updated cost estimate, in order to  
22 determine whether the establishment of the UCSA is economically feasible and in the public interest  
23 pursuant to A.R.S. §40-346 (A). Staff would disagree with an interpretation of a statute as a  
24 limitation of the authority of the Commission to act as it deems appropriate to protect the public  
25 interest in the exercise of its statutory authority.

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27 <sup>4</sup> A.R.S. § 40-342(F).

28 <sup>5</sup> A.R.S. § 40-343(B).

<sup>6</sup> A.R.S. § 40-346.

1 **III. SHOULD THE COMMISSION CONSIDER WITHDRAWALS OF SIGNATURE**  
2 **AND/OR OBJECTIONS TO THE USCA RECEIVED LATER THAN JANUARY 8,**  
3 **2009?**

4 A.R.S. § 40-344 requires any person wishing to withdraw from the petition or objecting to the  
5 establishment of the UCSA to file such objections with the Commission not later than ten days prior  
6 to the date set for hearing. A.R.S. § 40-345 specifically provides the procedure by which the  
7 Commission is to determine the validity of protest, objections and withdrawal of signatures from the  
8 petition. If, after the hearing, the Commission determines that no more than 40 percent of the owners  
9 who own no more than 40 percent of the real property within the proposed UCSA have not objected  
10 to the formation of the UCSA, and if the Commission determines that the conversion is economically  
11 and technically feasible, the Commission is required to issue an order establishing the area as a  
12 UCSA.<sup>7</sup> Staff maintains its position in its March 21, 2008 brief that late withdrawals should not be  
13 counted. However, the Commission in weighing the economic feasibility of this project may consider  
14 the late withdrawals.

15 **IV. WHAT IS THE CURRENT LEVEL OF SUPPORT AMONG THE PROPERTY**  
16 **OWNERS FOR THE USCA?**

17 In Hillcrest's May 2009 filing, the new petition shows 127 votes in favor of the project. Staff  
18 notes that in the corrected filing and in further discussions with Hillcrest there are actually 129 votes  
19 in favor. Staff calculates the votes and percentages as follows:

	Yes votes	% of owners	% of Square footage	Number of parcels
Parcel 274 in/no vote change (ROO)	149	62.917%	59.69%	237
Parcel 274 in/no vote change/new petition	129	54.4%	52.5%	237
Parcel 274 in/ vote change/new petition	119	50.2%	48.7%	237
Parcel 274 out/no vote change/new petition	129	54.7%	54.2%	236
Parcel 274 out/vote change/new petition	119	50.4%	50.2%	236

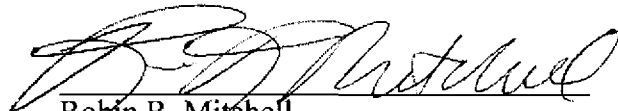
28 <sup>7</sup> A.R.S. § 40-346.

1 It is not surprising that that support has dwindled given the recession that is affecting the US, which  
2 was not present at the time of the initial petition.

3 **V. IF THE CURRENT LEVEL OF SUPPORT IS LESS THAN 60% FOR EITHER**  
4 **NUMBER OF PARCELS OR SQUARE FOOTAGE CAN AND SHOULD THE**  
5 **COMMISSION APPROVE THE UCSA?**

6 Given the current level of support and if Parcel 274 is included, the petition does not meet the  
7 threshold requirements of the statute. If the Commission were to adopt the ROO, the petition would  
8 still fail for lacking the requisite amount of square footage. Pursuant to ARS § 40-346, if, after the  
9 hearing, the Commission determines that no more than 40 percent of the owners who own no more  
10 than 40 percent of the real property within the proposed UCSA have not objected to the formation of  
11 the UCSA, and if the Commission determines that the conversion is economically and technically  
12 feasible, the Commission is required to issue an order establishing the area as a UCSA. Given the  
13 unprecedented turmoil in the financial markets, the current recession, and the changed financial  
14 positions of some of the owners as expressed in letters to the docket, the Commission has the  
15 discretion to consider such factors in making a determination.

16 RESPECTUFLLY SUBMITTED this 6<sup>th</sup> day of July, 2009.

17 

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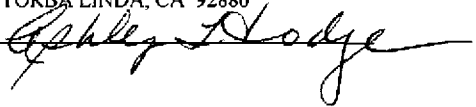
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	#2 VISTA DEL SOL	2775 HILLCREST DRIVE
28	LAGUNA BEACH, CA 92651	PARKER, AZ 85344

1	ANDRE M. & LINDA E. DURAN & RUDY E. & SIMONETTE E. LOVATO 23147 DONAHUE COURT MORENO VALLEY, CA 92553	LARRY E. & LAURA S. GRESETH 1026 YAVAPAI HILLS DRIVE PRESCOTT, AZ 86301
2		
3		
4	CHARLES JOSEPH SWN 2801 HILLCREST DRIVE PARKER, AZ 85344	JOHN JACOB WESTRA & CALVIN NYLES WESTRA, TRUSTEES WESTRA FAMILY TRUST 4379 HWY 147 LAKE ALMANOR, CA 96137
5		
6	MICHAEL E. & MELANIE A. STEWART 2793 HILLCREST DRIVE PARKER, AZ 85344	CALEB J. & KRISTINA A. BRANDEL & JUDITH B. SHIPLEY 7307 LENOX RIVERSIDE, CA 92504
7		
8		
9	JIM THURMAN 2785 HILLCREST DRIVE PARKER, AZ 85344	DELVIN G. & GERTRUDE A. WARREN; JENNA MESSINA 278 AGATE WAY BROOMFIELD, CO 80020
10		
11	HILLCREST BAY, INC. 924 BAY VIEW DRIVE PARKER, AZ 85344	THOMAS J. GEALY, IV & DENISE M. GEALY EDWARD F. FERRALL, SR. & MARGARET FERRALL; & EDWARD FERRALL, JR. & SUSAN L. FERRALL 18250 DEVONWOOD CIRCLE FOUNTAIN VALLEY, CA 92708
12		
13		
14	WILLIAM H. & SHARI D. DAGE P.O. BOX 1297 BANNING, CA 92220	JERRY & KELLY GOODMAN 68440 TAHQUITZ RD., #4 CATHEDRAL CITY, CA 92234
15		
16	LA PAZ COUNTY 1108 JOSHUA AVENUE PARKER, AZ 85344	JOHN R. & JUDITH L.P. MCLEAN, DALLSA NOX C/O; ATTN: BILL RECEIPT AREA 5081 NORRIS STREET IRVINE, CA 92604
17		
18		
19	HILLCREST WATER COMPANY 915 E. BETHANY HOME ROAD PHOENIX, AZ 85014	FRANK I. & JAN (AKA JANET) ROBLES P.O. BOX 31417 TUCSON, AZ 85751
20		
21	MARTIN BRANNAN LA PAZ COUNTY ATTORNEY 1320 KOFA AVENUE PARKER, AZ 85344	CRAIG A. & CINDY S. MARTIN, TRUSTEES MARTIN FAMILY REVOCABLE TRUST 2184 CARTWHEEL CIRCLE CORONA, CA 92880
22		
23		
24	ROBYN L. STEIN 2338 N. EATON COURT ORANGE, CA 92867	WILLIAM M. & JOAN WHITTLINGER TED & MARY WHITTLINGER 49071 DENTON ROAD - APT. 106 BELLEVILLE, MI 48111
25		
26	MALLIETT INVESTMENTS, LLC 5373 W. FIRST STREET LUDINGTON, MI 49431	RONALD & SYLVIA NELSON 835 MAX VIEW DRIVE PARKER, AZ 85344
27		
28		

1	CHARLES S. & BARBARA A. MANNING, TRUSTEES	SCOTT K. JONES, SR. & CAROLA A. JONES,
2	29214 OLD WRANGER ROAD	TRUSTEES, JONES REVOCABLE TRUST
3	CANYON LAKE, CA 92587	7991 INWOOD LANE
		LA PALMA, CA 90623
4	MATTHEW ANNALA	LAURENCE A. & MARJORIE WARD
	13122 OLYMPIA WAY	867 E. LINGER DRIVE
5	SANTA ANA, CA 92705	PARKER, AZ 85344
6	JOHN W. LOURKOS & JAMIE BRANDEL	CYNTHIA I. MILES & SANDRA L. MAGANA
	WILLIAM W. & GERALDINE BERANDEL	961 N. CLEVELAND STREET
7	14255 JUDY ANN DRIVE	ORANGE, CA 92867
	RIVERSIDE, CA 92503	
8	GARY J. SCHMITT	PAMELA A. LEGGETT, TRUSTEE
9	3229 KLUK LANE, SUITE 100	PAMELA A. LEGGETT REVOCABLE TRUST
	RIVERSIDE, CA 92501	P.O. BOX 1395
10		PARKER, AZ 85344
11	CARLSON T. & DARLENE E. LOFTIS, TRUSTEES	RUBEN GOMEZ, JR. & DIANE GOMEA;
	CARLSON T. LOFTIS & DARLENE E. LOFTIS	WILLIAM C. & CONSTANCE F. RIACH
12	REVOCABLE LIVING TRUST	& JED WILLIAM RIACH
	54 WEST FOREST TRAIL	P.O. BOX 112
13	FREE SOIL, MI 49411	RUNNING SPRINGS, CA 92382
14	ROBERT & LORI NELSON	DONALD & MELODY CLARK
	P.O. BOX 401971	16900 TAFT STREET
15	HERPERIA, CA 92340	RIVERSIDE, CA 92508
16	LINDA KAY CLAMP & DAVID EDWARD SEAVER	DAN & TERI PETERS
	3457 EL CAMINO REAL	5838 APPLECROSS DRIVE
17	PALO ALTO, CA 94306	RIVERSIDE, CA 92507
18	MARVIN L. & JOAN K. JORDAN	TROY & TAMMIE WARD
	P.O. BOX 228	41755 CASCADE COURT
19	LA QUINTA, CA 92253	TEMECULA, CA 92591
20	LOUIS M. & LINDA D. WILSON	MICHAEL J. SCHAPER
	4421 E. VALLEY GATE	7383 SVL BOX
21	ANAHEIM HILLS, CA 92807	VICTORVILLE, CA 92392
22	RAYMOND G. GROSSMAN, SR. & ANN M. GROSSMAN	ELIZABETH A. HACKE
	118 N MORADA	858 BAY VIEW DRIVE
23	WEST COVINA, CA 91790	PARKER, AZ 85344
24	EDWARD WOODWORTH DEUEL III &	TIMOTHY & JOLA NETTE HUBBS
	NANCY LEE DEUEL, TRUSTEES,	P.O. BOX 474
25	EDWARD AND NANCY DEUEL FAMILY TRUST	RUNNING SPRINGS, CA 92382
	6892 VIA CARONA DRIVE	
26	HUNTINGTON BEACH, CA 92647	
27	JENNIFER D. FLETCHER	LARRY W. & SHEARL LYNN THOMPSON
	22482 ALMA ALDEA #79	12642 LAMPLIGHTER
28	RANCHO SANTA MARGARITA, CA 92688	GARDEN GROVE, CA 92845

1	ALBERT L. & MARIA G. REYES	BARBARA A. DEMEREST
2	11751 ROSWELL AVENUE	11616 RECHE CANYON RD.
	CHINO, CA 91710	COLTON, CA 92324
3	JOHNNY A. & BILLIE DODSON	NANDO F. HAASE & DONNA C. MERRILL
4	816 BAY VIEW DRIVE	830 BAY VIEW DRIVE
	PARKER, AZ 85344	PARKER, AZ 85344
5	ROY & MARGARET HOKENSON	WAYNE D. & ZELMA M. DUNHAM
6	880 BAY VIEW	TRUSTEES, DUNHAM FAMILY TRUST
	PARKER, AZ 85344	P.O. BOX 68
7		SAN CLEMENTE, CA 92674
8	KELLI SMITH	WESLEY E. BERGSTON SR. & THERESE
	927 HIGH COUNTRY	BERGSTON, WESLEY E. GERSTON, JR.
9	GLENDORA, CA 91740	25681 PALMWOOD DRIVE
		MORENO VALLEY, CA 92557
10	CARL ALVARADO & SHERRY CRAVEN	GEORGE NAULT
11	791 BAY VIEW DRIVE	LA PAZ COUNTY ASSESSOR
	PARKER, AZ 85344	1112 JOSHUA AVENUE, STE. 204
12		PARKER, AZ 85344
13	DOWELL A. & KATHERINE S. KUBICA	ROBERT P. & CAROL E. BISCHOFF,
	TRUSTEES, DOWELL A. KUBICA & KATHERINE S. KUBICA	TRUSTEES, BISCHOFF LIVING TRUST
14	FAMILY TRUST	651 CENTER CREST
	6819 TAHITI DRIVE	REDLAND, CA 92373
15	CYPRESS, CA 90630	
16	KENNETH R. HEPLER, JR.	MICHELLE M. GAYLER
	40735 LA COLIMA	P.O. BOX 1413
17	TEMECULA, CA 92591	THERMA, CA 92274
18	RICHARD L. & HELEN T. POWELL	HAROLD ERIC & KATHIE JO JONES
	874 NOBLE VIEW DRIVE	4715 E. WARWOOD ROAD
19	PARKER, AZ 85344	LONG BEACH, CA 90808
20	ALBERT & AMELIA NEVARES	DAVID P. & PATRICIA CARMICHAEL
	4756 MURIETTA STREET	912 S. EASTHILLS DRIVE
21	CHINO, CA 91710	WEST COVINA, CA 97191
22	KENT A. & TERESA B. THOMPSON	ROBERT L. & ROBERTA A. GOLISH
	13811 MAYPORT AVENUE	501 N. CLENTINE STREET
23	NORWALK, CA 90650	ANAHEIM, CA 92801
24	KENNETH J. & EILEEN K. THOMPSON, TRUSTEES	FILMORE H. ANDERSON
	78710 DARRELL DRIVE	VIRGINIA L. ANDERSON
25	BERMUDA DUNES, CA 92201	920 E. SWAN DRIVE
		PARKER, AZ 85344
26	LYNDA LEDBETTER	JOHN M. & PEGGY J. STEINER, TRUSTEES
27	570 RIM VIEW DRIVE	STEINGER FAMILY TRUST
	TWIN FALLS, ID 83301	3220 SARATOGA AVENUE
28		LAKE HAVASU CITY, AZ 86406

1	STEVE BENTON & DELIA ALVARADO	GERALD C. & CAROLA L. MCGINNIS
2	2948 S. NOBLE VIEW DRIVE	TRUSTEES, MCGINNIS FAMILY TRUST
3	PARKER, AZ 85344	3370 LEES AVENUE
		LONG BEACH, CA 90808
4	ROGER ANDREW & SALLEY JEANNE SHORE,	STUART & DENISE CURRIE
	TRUSTEES	RICHARD J & ANDREA WILKE, TRUSTEES
5	SHORE FAMILY REVOCABLE LIVING TRUST	WILKIE FAMILY REVOCABLE TRUST
	21225 PINEBLUFF DRIVE	DAVID M. & DOROTHY D. GLYNN
6	TRABUCO CANYON, CA 92679	4545 SUNFIELD AVENUE
		LONG BEACH, CA 90808
7	GLE M. & EILEEN DALTON	JACK M. & BARBARA JO HUTCHENS
8	2910 S. MANOR VIEW	TRUSTEES, HUTCHENS FAMILY TRUST
	PARKER, AZ 85344	151 N. HOLGATE
9		LA HABRA, CA 90631
10	BETTY JANE BRYANT & GOLDIE JUNE JORDAN	CLARK & PIPER A. SLONE
	78976 SPIRIT COURT	40641 BEAR CREEK STREET
11	PALM DESERT, CA 92211	INDIO, CA 92203
12	ANDREW R. & SHANNA S. MCCLOSKEY	MAC & JOYCE FRAZIER
	5000 WINDY CIRCLE	1777 LEWIS AVENUE
13	YORBA LINDA, CA 92887	LONG BEACH, CA 90813
14	CHARLES E. STIREWALT	DUANE E. & RUTH V. FERGUSON, TRUSTEES
	2932 BALLESTEROS LANE	FERGUSON TRUST
15	TUSTIN, CA 92672	2814 MANOR VIEW DRIVE
		PARKER, AZ 85344
16	RICHARD S. & JOY M. MUZIC	FRED A. & LYNNE S. MUZIC
	TRUSTEES, MUZIC LIVING TRUST	16411 UNDERHILL LANE
17	10315 FELSON STREET	HUNTINGTON BEACH, CA 92647
	BELLFLOWER, CA 90706	
18	LARRY CARTWRIGHT	VERONICA PEDREGON
19	75 KEEGAN COURT	855 BAY VIEW DRIVE
	SUSANVILLE, CA 96130	PARKER, AZ 85344
20	JEROME P. & KAREN M. BOWE	JOHN D. II & JACQUELINE Y. YARBROUGH
21	849 MAX VIEW DRIVE	TRUSTEES, YARBROUGH REVOCABLE TRUST
	PARKER, AZ 85344	P.O. BOX 616
22		PARKER, AZ 85344
23	GARY L. & SUZANNE A. SMITH	LOUISE DENVER
	531 APACHE DRIVE	889 SWAN DRIVE
24	PLACENTIA, CA 92870	PARKER, AZ 85344
25	NANCY SUZANNE ARCHER	KAREN L. & JAMES BIBBY
	861 CRYSTAL VIEW DRIVE	873 SWAN DRIVE
26	PARKER, AZ 85344	PARKER, AZ 85344
27		
28		

1 RICHARD A. & KIMBERLY E. HAMPTON  
1143 ANDREW LANE  
2 CORONA, CA 92881  
3  
4 ALFRED & SHERYL BEAUVAIS  
5318 ELK COURT  
5 FONTANA, CA 92336  
6  
7 MARK S. & JEANNINE LONG  
548 WOODHAVEN COURT  
8 UPLAND, CA 91786  
9  
10 BRIAN D. WOOD & ARTHUR WOOD, JR.  
3217 S. NORTH SHORE DRIVE  
11 ONTARIO, CA 91761  
12  
13 JULIANA PEREZ  
4169 MENTONE AVENUE  
14 CULVER CITY, CA 90232  
15  
16 MICHAEL JOSEPH & TAMARA LYNN WILKINSON  
4 BELLA FIRENZE  
17 LAKE ELSINORE, CA 92532  
18  
19 ANNETTE M. KINCAID  
1975 W. LINDEN STREET  
20 RIVERSIDE, CA 92507  
21  
22 TIMOTHY GORDON & ROBIN ALICIA EVANS  
24482 CHAMALEA  
23 MISSION VIEJO, CA 92691  
24  
25 DAN R. & VIVIAN T. GOOD, TRUSTEE  
DAN R. GOOD & VIVIAN T. GOOD  
26 DELCARATION OF TRUST  
P.O. BOX 53 HWY 108  
27 STRAWBERRY, CA 95375  
28  
29 LINK T. & SANDRA C. JOHNSON, TRUSTEES  
LINK T. JOHNSON & SANDRA C. JOHNSON  
30 REVOCABLE LIVING TRUST  
1112 W. HOUSTON AVENUE  
31 FULLERTON, CA 92633  
32  
33 SCOTT K. JONES, JR. & ZAHIRA V. DELGADILLO,  
TRUSTEES  
34 SCOTT K. JONES, JR. & ZAHIRA V. DELGADILLO  
JONES REVOCABLE TRUST  
35 5732 PLACERVILLE PL.  
36 YORBA LINDA, CA 92886  
37  
38 

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1021 N. PUENTE STREET  
BREA, CA 92821

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1826 COMARAGO COURT  
CORONADO, CA 92833

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784 SWAN DRIVE  
PARKER, AZ 85344

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SHARON ERROR TRUST  
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ROUSTAN LIVING TRUST  
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